



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

September 10, 2021

VIA ECF

Magistrate Judge Lois Bloom
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Capogrosso v. Gelbstein, et al., No. 18 Civ. 2710 (EK) (LB)

Dear Judge Bloom:

The Office of the Attorney General represents Defendants Gelbstein, Traschen, Calvo and the DMV (the “State Defendants”) in the above-referenced matter. I write to request that the Court relieve former Assistant Attorney General (“AAG”) Elizabeth Forman as well as AAG D. Stan O’Loughlin (the undersigned) as counsel in this matter. AAG James Thompson will continue to represent the State Defendants on behalf of the Attorney General.

I am requesting that former AAG Forman be relieved as counsel in light of her departure from the Office of the Attorney General. I am requesting that the undersigned be relieved as counsel because I have been reassigned to other matters. Accordingly, I ask the court relieve both former AAG Forman and the undersigned as counsel of record in this matter and that the Court direct the Clerk of Court to terminate their appearances herein.¹

Respectfully,

/s/ D. Stan O’Loughlin
D. Stan O’Loughlin
Assistant Attorney General
(212) 416-8593

¹ Because the attorney of record for the State Defendants has not technically changed—it was and remains the Attorney General’s Office—it is not clear whether this request falls within the ambit of Local Civil Rule 1.4. In the event that it does, the instant request should nonetheless be granted under that Rule in light of Ms. Forman’s departure from the Office and the fact that AAG Thompson continues to represent the State Defendants.